



**The Commonwealth of Massachusetts**

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**DEPARTMENT OF  
TELECOMMUNICATIONS AND ENERGY**

BAY STATE GAS COMPANY  
D.T.E. 06-36

**SECOND SET OF INFORMATION REQUESTS OF THE  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to Bay State Gas Company ("Company") the following Information Requests.

- DTE 2-1 Please refer to the Company's response to Information Request ("IR") DTE 1-1. Explain why the Company failed to notify the Department, prior to the established reporting deadline of March 31, 2006, that the Company was unable to comply with the Department directive to submit for Department review, a complete proposal for monitoring overtakes by grandfathered transportation customers. Bay State Gas Company, D.T.E. 05-27 (2005) at 356. When did the Company earnestly make efforts to comply with this directive and describe those efforts.
- DTE 2-2 Assuming the Department were to approve the Petition:
- (a) provide a list of all actions that Bay State would need to undertake to implement the proposal.
  - (b) indicate the specific time frame for each action.
  - (c) indicate whether Bay State considers any of the actions to be critical for the winter of 2006-07. If so, provide supporting documentation for that assessment.
  - (d) identify the likely providers, if any, of both capacity and supply that Bay State would contact to implement the proposal.
  - (e) identify any additional regulatory approvals that may be required to implement the proposal.
- DTE 2-3 If the Petition were denied, indicate all actions Bay State would need to take to provide reliable firm service for the winter of 2006-2007.

- DTE 2-4 Please refer to IR DTE 1-11. Provide any letters, documents, notes, correspondence and minutes of any meetings with marketers and/or grandfathered customers held by the Company, explaining the Company's concerns about overtakes and the problems that overtakes cause for the distribution system. If there are none, so state.
- DTE 2-5 Please refer to IR DTE 1-8 and Exh. BSG-1, Att. JAF-1. Please provide copies of written responses from customers and/or marketers related to the Company's notification to grandfathered customers of the potential for shutoff. If there are none, so state.
- DTE 2-6 Please refer to the Company's responses to IR DTE 1-26 and Exh. BSG-1, Att. JAF-2. Please verify that the last time the Company experienced an overtake by grandfathered customers was on December 6, 2004.
- DTE 2-7 Please refer to the Company's responses to IR DTE 1-6. Does the response mean that no grandfathered customers have returned to firm sales service since October 15, 2000? If yes, reconcile this with the Company's expressed concern in DTE 02-75 that the prospect that grandfathered customers might return to sales service was a reason for the ten percent contingency reserve proposed in that proceeding.
- DTE 2-8 Provide the number of and volume for each grandfathered customer added by the Company since November 1999.
- DTE 2-9 Please refer to the Company's response to IR SPR 1-11, Att. SPR 1-11. Explain why the Design Day EDD is a cold January day at 4% probability. Specifically, explain the basis for the 4% probability.
- DTE 2-10 Please refer to the Company's response to IR Hess 1-9. Explain how the Company differentiates between overtakes caused by grandfathered customers and those caused by other customers.
- DTE 2-11 Please refer to the Company's response to IR Hess 1-15. State the proportion of the 30% design day load of all grandfathered customers included in the Company's proposal that is due to a reliability requirement and the proportion that is due to incremental planning standard.

DTE 2-12 Please refer to the Company's response to IR Hess 1-20.

- (a) State the number and percentage of grandfathered customers who act as their own supplier.
- (b) Explain the procedure that the Company uses to identify a specific customer overtake on any given day when the overtake is associated with a customer who acts as its own supplier and is not included in a Supplier pool.
- (c) How cost-effective is the procedure?

DTE 2-13 Please refer to the Company's response to IRs SPR 1-13 and SPR 1-14. Explain the mechanisms that the Company has in place to discourage grandfathered customers from overtakes.

Dated: July 21, 2006